

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION
C/A No.: 3:15-cv-04670-MGL

K.C.)
)
Plaintiff,)
)
v.)
)
South Carolina Department of Social)
Services (SCDSS), South Carolina Youth)
Advocate Program, Inc., Growing Home)
Southeast, Inc., Growing Home, Inc. of)
Minnesota, Veronica Harris-Barker, Blanch)
James, Yolanda D. Wilson, Thompson)
Child and Family Focus f/k/a Episcopal)
Church Home for Children (South)
Carolina), and Kathryn B. Peterson,)
)
Defendants.)

**NOTICE OF REQUEST FOR PROTECTION
FROM COURT APPEARANCE**

PLEASE TAKE NOTICE that Eugene H. Matthews, Esquire, counsel for Defendant Thompson Child and Family Focus f/k/a Episcopal Church Home for Children (South Carolina), will be out of state due to receiving military orders to report for annual training with the U.S. Navy from February 29, 2016 through March 9, 2016, and from March 28, 2016 through April 1, 2016. Counsel is unaware of any court appearances currently scheduled during those dates.

Mr. Matthews therefore requests protection from any court appearances from February 29, 2016 through March 9, 2016, and from March 28, 2016 through April 1, 2016 in the above captioned case.

Dated this the 23rd day of February, 2016.

Respectfully submitted,

RICHARDSON PLOWDEN & ROBINSON, P.A.

s/Eugene H. Matthews

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FOR CHILDREN (SOUTH CAROLINA)**